



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** THOMAS VARGHESE

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

**Disclosure # 1:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
Ali Dawoodi	503750/2015	Kings Cty. Sup. Ct.	3-17-15		Pending

IN ADDITION,  
ALI DA WOODI V. CITY OF NEW YORK, ET AL, 026003/2014, FILED IN BRONX COUNTY SUPREME COURT.

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure #2:**

CCRB CASE: 200509835

REPORT DATE: 8/23/05

INCIDENT DATE: 08/20/05

SUBSTANTIATED CCRB ALLEGATION(S):

1. ABUSE -RETALIATORY ARREST – SUBSTANTIATED.
2. ABUSE – SEARCH OF PERSON – SUBSTANTIATED.

DISPOSITION: CHARGES DISMISSED BY THE NYPD.

Eric Gonzalez  
District Attorney  
Kings County